



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU X0A 0H0

*Your file - Votre référence*  
2AM-WTP1826

January 17, 2019

*Our file - Notre référence*  
CIDM#1239018

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
Gjoa Haven, NU X0B 1J0

Sent via email: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: AEM's responses to Crown-Indigenous Relations and Northern Affairs Canada  
comments on 2AM-WTP1826 Operational ARD-ML Sampling and Testing Plan**

Dear Mr. Dwyer,

Thank you for the email notice, received on January 15, 2019, requesting CIRNAC to confirm by January 17, 2019, on whether or not AEM's responses address CIRNAC's concerns for 2AM-WTP1826 Operational ARD-ML Sampling and Testing Plan. CIRNAC reviewed the responses, pursuant to its mandated responsibilities from the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

CIRNAC notes that AEM did not provide any new information or analysis to address CIRNAC's two remaining concerns (i.e., CIRNAC comments and recommendations #11 and #19) and referred to the NWB for direction. Therefore, AEM's responses did not address CIRNAC's concerns.

CIRNAC reiterates that the objective of this plan is to identify any potentially acid generating (PAG) or metal (arsenic) leaching (ML) waste rock so that none of it will be mistakenly used for the construction of the 4.7-meter thick cover of the waste rock storage facility. With such a slim margin of error and for reasons articulated in CIRNAC's October 2018 submission to the NWB, CIRNAC has serious concerns that the plan's objective can be achieved without the implementation of CIRNAC's recommendations, including #11 and #19.

If you have any questions or require any further information with respect to this matter, please contact me at (867) 975-4555 or [david.zhong@canada.ca](mailto:david.zhong@canada.ca), or Ian Parsons at (867) 222-9278 or [ian.parsons@canada.ca](mailto:ian.parsons@canada.ca).

Regards,

David Zhong  
Regulatory and Science Advisor

